

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

<b>IN RE:</b>	)	
	)	
<b>Green Copper Holdings, LLC</b>	)	<b>Case No. 25-10088-T</b>
<b>EIN No. xx-xxx9708</b>	)	<b>Chapter 7</b>
	)	
<b>Copper Tree, Inc.</b>	)	<b>Substantively Consolidated</b>
<b>EIN No. xx-xxx6608</b>	)	
	)	
<b>The Inn at Price Tower, Inc.</b>	)	
<b>Debtors.</b>	)	

**CLAIMANT LINDA JONES' RESPONSE AND OBJECTION TO PICTORIA STUDIOS  
USA, INC. AND TAKTIK ENTERPRISES, INC. OBJECTION TO CLAIM NO. 19-2  
(Dkt. 253)**

Claimant Linda Jones ("Jones") submits this response and objection to Pictoria Studios and Taktik Enterprises ("Objecting Parties") Objection to Claim No. 19 (Dkt. 253). In support of her Claim and as an objection to the Objecting Parties' requested relief, Jones states as follows:

1. Jones filed Claim No. 19-2, for wages for wages and penalties owed by the Debtor's estate.
2. Without regard to Debtors' classification of Jones' service for the Debtors, Jones should have been classified as an employee rather than a contractor. Jones only worked for Debtor, she worked on their equipment, and maintained an office at Price Tower. Further, she was paid the same amount each month regardless of how much she worked. See, OK Admin Code 380:30-1-2 ("Independent Contractor").
3. Jones asserts that as an employee of the Debtor that her wages were not paid. As an employee Oklahoma law establishes Jones is entitled to penalties in an amount equal to any unpaid wages. 40 O.S. § 165.3(B) (OSCN 2025). For the period of April 1, 2023 to August 6, 2024, Jones is entitled to wages in the amount of \$48,580.65 and penalties equal to \$48,580.65, for a total claim amount of \$97,161.30. See Claim No. 19-2.
4. Jones denies the Objecting Parties remaining allegations.

5. The Trustee filed his Motion to Settle Proof of Claim 19-2 (Dkt. 264) seeking Court approval to settle and compromise Claim 19-2.

Wherefore, Jones requests that this Court enter an Order:

- a. Approving Jones' Claim 19-2 as filed or in such amount as may be agreed to by Jones and the Trustee, and approved by the Court.
- b. Set a hearing to hear evidence of Jones' Claim 19-2, and address Objecting Parties' objection (Dkt. 253).
- c. Awarding Jones attorney's fees and cost against the Objecting Parties.

Respectfully submitted,

/s/ Kevin P. Doyle

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#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 17, 2025, a true and correct copy of the foregoing pleading was served electronically on participants in the CM/ECF system according to local procedures.

/s/ Kevin P. Doyle